

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

SANDRA BETTERS,

Plaintiff

v.

NARDIN ACADEMY, MARSHA SULLIVAN,
MICHAEL LAWLEY, FRANK EWING,
LUKE JACOBS, CHARLIE CHIAMPOU,
PATRICIA LORENC, KENT LORENCE and
THERESE FORTON-BARNES,

Defendants

NOTICE OF MOTION

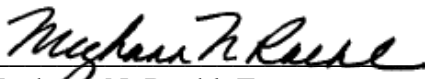
Civil Action No.
1:23-cv-00882

PLEASE TAKE NOTICE that, upon the declaration of Meghann N. Roehl, Esq. dated February 1, 2024, with exhibits attached thereto, and the memorandum of law dated February 1, 2024, Defendant, Therese Forton-Barnes (hereinafter “Defendant”), will move this Court on a date and at a time to be designated by the Court, before the Hon. John L. Sinatra, Jr., United States District Court, Western District of New York, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202, for an Order, pursuant to Fed. R. Civ. P. 12(b)(6), dismissing the complaint, with prejudice, together with other and further relief as this Court may deem just and proper.

THIS MOVING PARTY RESERVES THE RIGHT TO FILE REPLY PAPERS AS SET FORTH IN LOCAL RULE 7.

Dated: Buffalo, New York
February 1, 2024

ROACH, BROWN, McCARTHY & GRUBER, P.C.


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